

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, <i>et al., ex rel.</i> , LAUREN KIEFF,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 03-12366-DPW
)	
WYETH,)	
)	
Defendant.)	
<hr/>		
UNITED STATES OF AMERICA, <i>et al., ex rel.</i> WILLIAM LACORTE,)	
)	
)	
Plaintiffs,)	
)	
v.)	Civil Action. No. 06-11724-DPW
)	
WYETH,)	
)	
Defendant.)	
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UNOPPOSED MOTION TO INTERVENE AS OF RIGHT

Pursuant to Rule 24(a)(2) of the Federal Rules of Civil Procedure, seventeen States including Colorado, Kansas, the Commonwealth of Kentucky, Maine, Maryland, Minnesota, Nebraska, New Jersey, North Carolina, Oregon, Rhode Island, South Carolina, South Dakota, Utah, Vermont, Washington, and Wyoming (collectively “the Intervening States”), hereby move for leave to intervene in the above captioned actions as a matter of right. The grounds for this motion are set forth in the Intervening States’ Memorandum of Law and attached declaration by

Loren F. Snell, Jr., which are submitted herewith. Attached to this motion is the Intervening States' proposed Multi-State Complaint in Intervention.

Dated: May 7, 2010

Respectfully submitted,

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LOCAL RULE 7.1 CERTIFICATION

The undersigned hereby certify pursuant to Local Rule 7.1(a)(2), that as counsel from Kansas, Maine and Massachusetts, on behalf of the moving State governments, we have conferred in good faith with counsel for the Relators, the United States and the Defendant in an effort to narrow or resolve the issues raised in this motion. We understand that none of the Parties will oppose this Motion.

Dated: May 7, 2010

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of these documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on May 7, 2010.

Dated: May 7, 2010

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